



FACTSHEET

Mandatory application of Indonesian National Standards in industrial sectors

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Introduction to standards in Indonesia

The development of Indonesian National Standards (SNI) lies within the responsibilities of the National Standardization Agency of Indonesia (BSN). The principles of SNI development refer to Annex 3 of the WTO TBT Agreement on the Code of Good Practice. These include transparency and openness, consensus and impartiality, effectiveness and relevance, coherence and development dimensions. New SNIs can be developed through the submission of new proposals or by adopting international standards. As of April 2023, there are 12,065 valid SNIs.¹

However, the SNIs developed by BSN are voluntary in nature. Their transformation into mandatory SNIs is carried out by the relevant government ministry/agency responsible for the sector by issuing a technical regulation.

According to Article 33 of Government Regulation No. 28 of 2021 on the Implementation of Industrial Sectors (GR 28/2021), the Minister of Industry has authority for monitoring, development and surveillance of standardisation in industrial sectors. In this regard, the Ministry of Industry is responsible for determining which SNIs are mandatory for industrial sectors. By June 2023, 307 SNIs were made mandatory through technical regulations. Of these mandatory SNIs, 124 fall under the authority of the Ministry of Industry.²

Ministry/Agency	Number of Mandatory SNIs under Technical Regulation
Ministry of Industry	124
Ministry of Energy and Mineral	88
Ministry of Public Works and Housing	44
Ministry of Trade	22
Ministry of Transport	9
Ministry of Agriculture	7
Information and Geospatial Agency	5
Ministry of Communication and Informatics	5
Ministry of Marine and Fisheries	2
National Cyber and Crypto Agency	1

This factsheet addresses the implementation of mandatory standards in Indonesia, particularly in the industrial sectors. It covers provisions which may be relevant to the private sector, including requirements for conformity assessment bodies (CABs) on obtaining the certificate of conformity and SNI markings. Furthermore, the final part also includes a brief section on surveillance of mandatory standards.

¹BSN, 2023, *Rekapitulasi SNI: Penetapan Tahun 2023 - Februari 2023-*, Accessed on 16 May 2023, https://bsn.go.id/uploads/download/statistik_sni_april_2023.pdf

²BSN, 2023, *Daftar SNI Wajib dan/atau yang Diacu dalam Regulasi Teknis*, Accessed on 13 July 2023, <https://bsn.go.id/main/berita/detail/11826/regulasi-teknis-sni-yang-diwajibkan>

Objectives and scope of MoI Reg 45/2022

An implementing regulation for GR 28/2021 was issued on 4 November 2022. This is Minister of Industry Regulation No. 45 of 2022 on Industrial Standardisation (MoI Reg. 45/2022), which was promulgated and entered into force on the same date.

Standardisation in this regulation includes the formulation, enactment, implementation, maintenance, enforcement and monitoring of industrial standards, consisting of Indonesian National Standards (SNI), Technical Specifications (ST) and Guidelines of Procedure (PTC).

The SNI refer to standards that are published by National Standardization Agency of Indonesia (BSN). The ST are documents consisting of technical requirements that refer to some of the SNI parameters and/or international standards. The PTC are documents that contain procedures for the design, manufacture, installation, maintenance or use of equipment, structures or products. Implementation of SNI and PTC is voluntary and can only be made mandatory through the enactment of ministerial regulations. Implementation of ST, on the other hand, is always mandatory.

The Ministry of Industry is responsible for determining the mandatory implementation of standards in the industrial sector. In this context, all technical regulations issued by the Minister of Industry regarding the implementation of mandatory SNI, ST and/or PTC that came into force prior to the enactment of MoI Reg. 45/2022 must be adjusted within two years. In the meantime, these regulations will continue to apply until the adjustment is made based on MoI Reg. 45/2022.

MoI Reg. 45/2022 revokes and replaces Minister of Industry Regulation 86/2009 on SNI in the Industrial Sector (MoI Reg. 86/2009) and Minister of Industry Regulation 4/2018 on Procedures of Surveillance for the Mandatory Implementation of Industrial Standardisation (MoI Reg. 4/2018). However, the implementing provisions of the aforementioned regulations remain valid provided that they do not conflict with MoI Reg. 45/2022



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provisions. MoI Reg. 45/2022 contains key changes in provisions compared to the previous regulations. These include the centralisation of all industrial standardisation processes under the authority of the Agency for Industrial Standardization and Service Policy (BSKJI) of the Ministry of Industry, the use of an online platform – the National Industry Information System (SIINas) – during the process, and the application of an electronic marking (QR code) as an addition to the SNI and/or conformity marking on the product.

MoI Reg. 45/2022 made significant changes to MoI Reg. 86/2009. The PTC, which was not included in the latter, is now covered by MoI Reg. 45/2022. The purpose of SNI implementation has also changed from that defined in MoI Reg. 45/2022. It now includes economic factors such as fair business competition, greater competitiveness and/or improvement to the framework for industrial efficiency and performance, as well as public safety, health and security and environmental preservation.

Furthermore, with the issuance of MoI Reg. 45/2022, the provisions on surveillance and monitoring of both voluntary and mandatory standards (SNI, ST and PTC) – which were previously regulated separately – have been combined into one regulation. This regulation seems to provide more clarity on certain provisions and

a more streamlined bureaucratic procedure in this regulation compared to its predecessor. With regard to the monitoring function, the Minister of Industry can mandate the BSKJI or, if necessary, appoint an accredited agency to carry out the monitoring. The provisions on surveillance and monitoring are elaborated in a separate sub-topic below.

Requirements for conformity assessment bodies (CABs)

Article 16 of Mol Reg 45/2022 states that conformity assessment activities for mandatory standards (Indonesian National Standards - SNI, Technical Specifications - ST, and Guidelines of Procedure - PTC) in industrial sectors can be conducted by CABs accredited by the National Committee on Accreditation (KAN) for the appropriate scope in accordance with the standards. In addition, CABs should be appointed by the Ministry of Industry. Three types of CAB can be appointed: product certification bodies (LS-Pro), testing laboratories and inspection bodies. For each of the three types of CAB, further specific requirements apply in accordance with Article 16 (3), (4) and (5):

Requirements	Apply to
Obtain relevant business licenses; located within Indonesian territory; accredited by KAN for areas aligned with the standard	All
Accredited with SNI ISO/IEC 17025	Testing laboratories
Accredited with SNI ISO/IEC 17020	Inspection bodies
Owning testing lab or inspection body fulfilling the above SNI ISO/IEC accreditation	Product certification bodies (LSPro)

The Ministry may also appoint CABs that do not yet meet KAN's accreditation criteria for the scope of the standards, provided that:

- **there is no accredited CAB in the appropriate area although there are CABs already accredited in a similar area;** or
- **there is only a limited number of accredited CABs in the appropriate area.**

However, this provision is only valid for two years on the basis of Article 16 (8).

The application process for the appointment of CABs must be done through SIINAs. The SIINAs platform will come into use from the date of the Ministry's announcement regarding mandatory standards and requirements for the appointment of CABs. CABs should also submit their application for appointment through SIINAs. Via the online platform, they are required to submit all necessary documents – including business licence, KAN accreditation, proof of ownership of the testing lab/inspection bodies for LSPro, organisation structure – and complete the form as per Annex III of the regulation.

Article 128 stipulates that all CABs appointed before Mol Reg 45/2022 enters into force will be evaluated by the Minister of Industry at the latest after 12 months. All appointed CABs are also required to report to the Ministry within seven days of the new issuance, extension, revocation or temporary suspension of conformity assessment results.

All appointed CABs will be monitored regularly or in special circumstances. In compliance with Article 101, CABs that violate the regulation shall be subject to administrative sanctions, which may consist of a written warning with a 15-day notice period to implement improvements. Failure to comply within the notice period will result in revocation of the appointment and blacklisting.

Conformity assessment procedures for mandatory Indonesian National Standards (SNI), Technical Specifications (ST) and Guidelines of Procedure (PTC)

There are two steps that producers/manufacturers must take for mandatory SNI, ST and PTC in industrial sectors. The first is to obtain the SNI certificate and/or conformity certificate (for ST and/or PTC). The second is to obtain the approval letter for using SNI marks and/or conformity marks. Both procedures are carried out via the online platform SIINas.

In accordance with Article 127, the Product Certificate for Use of the SNI Marking (SPPT-SNI) issued prior to implementation of Mol Reg 45/2022 remains valid as both SNI certificate and authorisation to use the SNI marking. Furthermore, in accordance with Article 129, the process for products with an ongoing conformity assessment procedure should be carried out in line with the provisions of the Ministerial Regulations on the mandatory application of SNI, ST and/or PTC.

In order to obtain an SNI and/or conformity certificate, producers/manufacturers must submit their application via SIINas. The application will then be verified by the Head of Agency for Industrial Standardization and Service Policy (BSKJI) and forwarded to the Product certification bodies (LSPro) for the conformity assessment process. The LSPro must report conformity assessment results via SIINas for evaluation and validation through electronic marking by the Head of BSKJI before certificates can be issued by the LSPro.

Article 34 regulates that these certificates can only be issued to producers/manufacturers using their own brand. In the case of brand cooperation and/or *Maklun*³, certificates may be issued if the registered brand belongs to the cooperation/*Maklun* provider located in Indonesia. If it is located outside Indonesia, it must have a representative office/licence holder in Indonesia. In addition, to be eligible, producers must have



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previously obtained an SNI or conformity certificates for their own brand.

Specifically, in accordance with Article 36 (2), foreign producers must provide evidence of having a representative office/licence holder in Indonesia, as well as approval/legalisation of their business licence from the Indonesian Embassy or Consulate General in their country of origin.

Having obtained an SNI and/or conformity certificate, producers/manufacturers must apply for an approval letter for the use of SNI marks and/or conformity marks. The approval letter is issued for SNI marking for a certain period of time and/or a certain number of products. In this context, domestic producers must submit evidence of production capacity, utilisation rate, production plans and realisation of production. Foreign producers, on the other hand, must submit evidence of production capacity, import plans and realisation of import.

³ An unofficial meaning of *Maklun* would be a type of service that manufactures a product on behalf of a third party.

The Head of BSKJI Issues the approval letter along with an electronic mark containing a link to the SNI and/or conformity certificate, product information and the approved period and/or number of products. Producers/manufacturers must then affix the SNI and/or conformity marks together with electronic marks (QR code) to their products accordingly.

In compliance with Article 49 (5), if it is not physically feasible to affix SNI and/or conformity marks and electronic marks to products/services, then the SNI and/or conformity certificate will be the main proof of compliance. Furthermore, in line with the transitional provision in Article 127 (2), products that have obtained the Product Certificate for Use of the SNI Marking (SPPT-SNI) are exempted from the obligation to display electronic marks until further provisions on the mandatory implementation of SNI for these specific products are stipulated in the Minister Regulation.

Surveillance of standards implementation

The surveillance of standards in the industrial sector was regulated by MoI Reg. 86/2009 and amended by the recent MoI Reg. 45/2022. Surveillance is required to maintain the validity of mandatory conformity/SNI certificates in the industrial sector. MoI Reg. 45/2022 governs general aspects relating to surveillance mechanisms. This is a new development in view of the fact that the surveillance mechanism is specified not in MoI Reg. 86/2009 but in the technical Minister of Industry regulations for the mandatory application of SNI in specific products/sectors.

However, MoI Reg. 45/2022 now mandates surveillance to be conducted periodically, at least once every two years, whereas the schedule for periodic surveillance was previously based on the provision of technical regulation for the

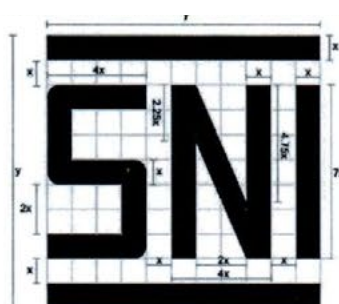


Figure 1: Application of SNI mark and electronic mark
Source: Annex IV of MoI Reg. 45/2022

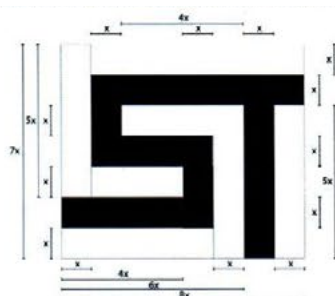


Figure 2: Application of conformity mark and electronic mark
Source: Annex IV of MoI Reg. 45/2022

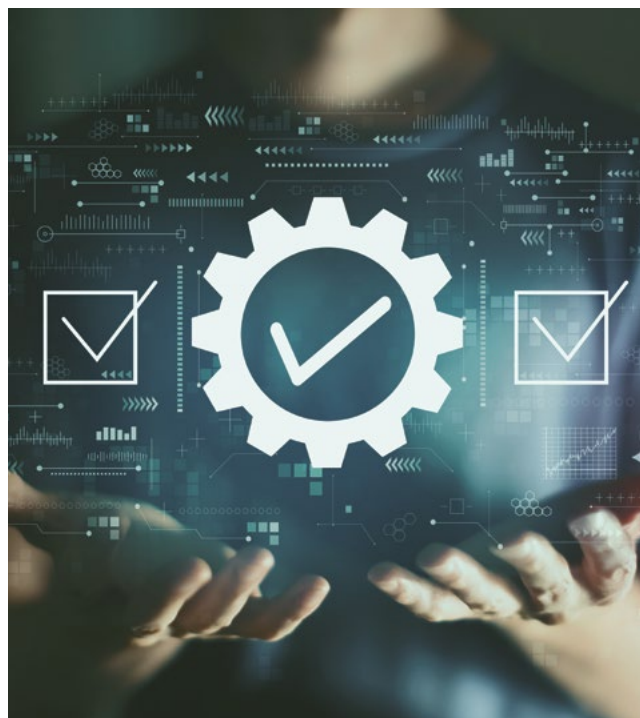
product/sector. It should also be noted that Mol Reg. 45/2022 places emphasis on surveillance of the validity of conformity assessments for Indonesian National Standards (SNI), Technical Specifications (ST) and Guidelines of Procedure (PTC). The previous regulation, on the other hand, focused on surveillance of companies or manufacturers that have obtained SPPT SNI – Product Certificate for Use of the SNI Marking.

Mol Reg. 45/2022 integrated into SIINas many of the processes relating to standards in the industrial sector. This includes the reporting of surveillance conducted by the Product certification bodies (LSPro) that issued the conformity/SNI certificate, which should be reported to the Agency for Industrial Standardization and Service Policy (BSKJI) via SIINas. Reporting will be evaluated by BSKJI, which may suspend the certificate if evaluation results show non-compliance with the applicable technical regulations.

Monitoring of standards implementation

Once the voluntary and mandatory standards (SNI, ST, PTC) are implemented, the Ministry of Industry conducts monitoring at production sites (factories of industrial companies in Indonesia and overseas, and warehouses of official representatives and/or license holders of foreign producers) and on the market. Monitoring activities are carried out both periodically and in special circumstances. According to Article 70, special monitoring is conducted if there is a report from the public, business actor, and/or relevant institution, and/or an evaluation result of data concerning the import of goods and/or data concerning the commodity balance.

Noncompliance with mandatory standards found in production sites requires companies to cease production no later than three days after notification and adjust their industrial goods and/or services accordingly. Product certification bodies (LS-Pro), which issued the SNI/conformity certificates, should subsequently conduct surveillance.



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Noncompliance found in the market requires companies to recall products from distributors, agents, wholesalers, retailers and/or consumers at the company's expense no later than one month after the notified date and/or stop importing these products no later than three days following notification. Companies are required to submit a plan on product recalls to the Head of Agency for Industrial Standardization and Service Policy (BSKJI) within five working days.

Sanctions will be imposed on companies/business actors who violate mandatory standards/provisions, fail to suspend their production process and/or do not recall their products accordingly.

About this factsheet

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About GPQI

The German Federal Ministry for Economic Affairs and Climate Action (BMWK) has commissioned the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH to implement the Global Project Quality Infrastructure (GPQI). The project's objectives are to reduce technical barriers to trade and increase product safety and consumer protection. Standardisation, conformity assessment and accreditation are parts of Quality Infrastructure that are discussed within the framework of the German-Indonesian Dialogue on Quality Infrastructure implemented by GPQI in Indonesia. Contact us to get involved: indonesia@gpqi.org

About EuroCham Indonesia

The European Business Chamber of Commerce (EuroCham) has been in existence in Indonesia since 2004 and represents European businesses in Indonesia. Its members currently comprise small, medium and large enterprises drawn from a wide variety of industrial sectors and countries with European interests. Today, EuroCham represents the majority of European companies' investments in Indonesia and is the only organisation in Indonesia promoting pan-European business interests. EuroCham represents member companies in an ongoing policy dialogue with the Indonesian Government. For all inquiries, please contact: info@eurocham.id, firman.eko@eurocham.id, daniel.rene@eurocham.id, and nadira.tatyana@eurocham.id.

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